

Wyoming Department of Agriculture

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The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.



Dave Freudenthal, Governor
John Etchepare, Director

August 18, 2008

Larry W. Sandoval, Jr., District Ranger
Laramie Ranger District
Medicine Bow National Forest
2468 Jackson Street
Laramie, WY 82070

Dear Mr. Larry Sandoval:

Following are the comments of the Wyoming Department of Agriculture (WDA) on your Draft Environmental Impact Statement (DEIS) for the Spruce Gulch Bark Beetle and Fuels Reduction Project.

Our comments are specific to our mission: to be dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposed project affects our agriculture industry, our natural resources, and the welfare of our citizens, it's important that we be kept informed of proposed actions and decisions and that we continue to be provided the opportunity to express pertinent issues and concerns.

We understand the need for an immediate and proactive action regarding the Mountain Pine Beetle epidemic occurring in the Spruce Gulch project area of the Medicine Bow National Forest (MBNF), not only for forest health and safety but also for Wildland-Urban Interface (WUI) areas. Clear cutting, selective thinning of trees, and other adaptive management practices will also create a benefit to rangelands and livestock grazing by allowing additional herbaceous vegetation growth to occur in treated areas. However, the immediate and potential secondary effects of the proposed project will impact grazing permittees, agriculture producers, landowners, and other citizens, as well as our natural resources, both in and adjacent to the proposed project area. For this reason, we offer the following comments.

It is our understanding the West Beaver Livestock Grazing Allotment and the Somber Hill Pasture of the Boswell Livestock Grazing Allotment are located in the proposed project area, and that only small areas of each allotment and pastures will be impacted by the proposed treatments. We suggest that if more than one treatment area is to occur in any given pasture or allotment that these treatments be staggered giving livestock the ability to move through the allotment and avoid active treatment areas. This would also allow a completed treatment area to be utilized by livestock while the next treatment area is being developed and completed.

The immediate impact on livestock grazing is the decrease in Animal Unit Months (AUMs) that will occur in active treatment areas. Although this is considered temporary, it should be

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analyzed as an immediate impact to livestock and management operations. Secondary impacts affecting livestock grazing are as follows and should be evaluated in the Final EIS:

- Addition of new roads, reconstruction of existing roads and opening of previously closed roads.
 - Create areas for invasive and noxious weeds to establish in disturbed areas,
 - Increase vehicle traffic impacting cattle movements, and potential injury and death due to collisions,
 - Direct vehicle/livestock disturbances and harassment by recreation users,
 - Loss of palatable vegetation due to increased dust on vegetation,
 - Gates being left open allowing for livestock to move into unwanted areas,
 - Potential increase in off-road travel, directly impacting vegetation and compaction of soils.
- Surface disturbance (including burn/slash piles, grading, skid trails, etc.)
 - Increase the opportunity for invasive and noxious weeds to establish in disturbed areas,
 - Direct loss of vegetation and AUMs during the proposed action.

The impacts of the proposed project could increase costs and decrease revenues for grazing permittees and other agriculture producers. The accumulated impacts of this, nearby and future projects could jeopardize the continued existence of grazing operations in this area. The individual and cumulative impacts and the proposed remedies need to be thoroughly identified, evaluated and added to the Final EIS.

Timely and successful reclamation and mitigation are needed and should be required. It is imperative that all new/temporary roads, and disturbed areas be reclaimed and re-seeded with an approved seed mix upon completion of the treatment. This includes the monitoring and eradication of invasive and noxious weeds in all disturbed areas until desired vegetation is established. Mitigation and reclamation for these impacts needs to be included in the final decision. These detrimental impacts also increase costs and reduce revenues for grazing permittees in this area. These costs and decreased revenues are not fully noted in the DEIS; they need to be thoroughly analyzed and mitigated in the Final EIS and decision.

We strongly encourage the Forest Service staff to work closely and consistently with all affected grazing permittees and agriculture producers to learn of their concerns and recommendation regarding the subject area. Agriculture producers are intimately familiar with the areas potentially affected by this proposal and they possess irreplaceable long-term, on-the-ground knowledge. They are particularly aware of both the individual and cumulative impacts upon wildlife, livestock, and rangeland health for the subject area. We highly recommend that during the planning process the Forest Service seek and address the concerns and recommendations of these stewards of habitat, forage, and rangeland health. Moreover, it is imperative that Forest Service officials continuously inform all livestock permittees who are directly and indirectly affected by the issues, decisions, and resulting actions regarding the proposed project.

Larry W. Sandoval, Jr.

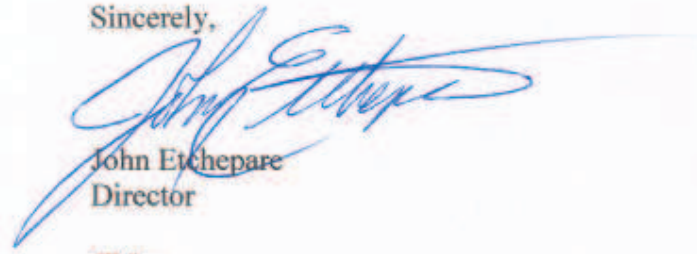
8/18/2008

Page 3

Decisions in the proposed plan should allow Forest Service officials and grazing permittees the opportunity to work cooperatively. Flexibility to make the best site-specific, case-by-case decisions that are in the best interests of the affected resources and citizens throughout the life of this plan should also be addressed.

In conclusion, we appreciate the opportunity to comment on the DEIS of the proposed actions. We encourage continued attention to our concerns and we look forward to hearing about and being involved in future proposed actions and decisions.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Etchepare", is written over the printed name and title.

John Etchepare
Director

JE/jc

CC: Governor's Planning Office
Wyoming Game and Fish Department
Wyoming Board of Agriculture